

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

THOMAS WILLIAMS,) CASE NO.1:21-CV-1863
)
Plaintiff,) JUDGE BOYKO
)
versus)
) **DEPOSITION OF**
MICHELLE HUNG, et al.,)
) **MICHELLE HUNG**
Defendants.)

— — — — —

Deposition of **MICHELLE HUNG**, a Defendant herein,
called by the Plaintiff for Cross-Examination pursuant
to the Federal Rules of Civil Procedure, taken by the
undersigned, Shannon L. Newhall, a Registered
Professional Reporter and Notary Public in and for the
State of Ohio, at the offices of Sutter O'Connell,
3600 Erieview Tower, 1301 East 9th Street, Cleveland,
Ohio, on Friday, the 29th day of April, 2021, at 1:27
p.m.

— — — — —

SN COURT REPORTING, LLC
shannon@sncourtreporting.com
330.417.4242

EXHIBIT
A

WILLIAMSON_000181

1 MR. NOVAK: Would you read it back again?

2 (The court reporter read the preceding
3 question as follows: Did you ever have sex
4 in the county offices? Yes or no?)

5 A. It's not a conversation that I recall, so how
6 could I retaliate for something that I didn't --
7 that I didn't have.

8 MR. NOVAK: Would you please read back
9 the question again?

10 (The court reporter read the preceding
11 question as follows: Did you ever have sex
12 in the county offices? Yes or no?)

13 Q. Do you have an answer?

14 A. I have answered the question.

15 MR. NOVAK: Would you read the question
16 back?

17 (The court reporter read the preceding
18 question as follows: Did you ever have sex
19 in the county offices? Yes or no?)

20 A. All I can say on that is, Mr. Williams' claim is
21 that I retaliated against him for having a
22 conversation with him and discussing sex in the
23 county office. I did not have that conversation
24 with him.

25 MR. NOVAK: Would you read back the

1 question again, please?

2 (The court reporter read the preceding
3 question as follows: Did you ever have sex
4 in the county offices? Yes or no?)

5 MR. CAHILL: I made my objections. You
6 should answer the question.

7 A. Yes.

8 Q. So you did have sex in the county offices?

9 A. Asked and answered.

10 Q. I was going to ask it again, because I wasn't
11 quite sure of your response. Are you saying yes
12 to -- that you are going to answer the question,
13 or yes that you had sex in the county offices?

14 MR. CAHILL: Objection to the form. Why
15 don't you ask your original question again?

16 MR. NOVAK: Ask the original question
17 again.

18 (The court reporter read the preceding
19 question as follows: Did you ever have sex
20 in the county offices? Yes or no?)

21 Q. Your answer is yes to that question?

22 A. Well, you'll have to be a little more specific on
23 the question, quite frankly, but -- county offices
24 is a plural question, sir.

25 Q. How about your office?

1 A. Yes.

2 Q. You had sex --

3 A. You got there. Good job.

4 Q. You had sex in your office?

5 A. Yes. That's the answer you guys all came for,
6 because you didn't know.

7 Q. That's your opinion.

8 A. No. The conversation never happened and he knows
9 it didn't happen.

10 MR. CAHILL: Wait -- wait to say -- don't
11 comment unless there is a question pending.

12 Q. And on Wednesday, June 23rd, did you tell Tom
13 Williams that you were having an affair with Harry
14 Williamson?

15 A. No.

16 Q. Do you remember having this conversation at all
17 before a board meeting which started at 6:00 p.m.
18 on the 23rd?

19 THE WITNESS: Rob, what do you want me to
20 do with this?

21 A. Do you remember having this conversation? What
22 conversation? I don't know what you are talking
23 about.

24 MR. CAHILL: Then tell him that.

25 A. I don't know what -- you are saying "this

1 conversation."

2 Q. I was pretty clear.

3 MR. NOVAK: Would you read it back?

4 A. But I answered the question clearly. No. So I
5 don't -- I don't understand.

6 MR. NOVAK: Read it back.

7 (The court reporter read the preceding
8 question as follows: Do you remember having
9 this conversation at all before a board
10 meeting which started at 6:00 p.m. on the
11 23rd?)

12 MR. CAHILL: Objection to the form.

13 You can answer.

14 A. What conversation?

15 Q. Do you remember --

16 A. You are saying "this conversation."

17 Q. Do you remember having a conversation with Tom
18 Williams on June 23rd sometime before 6:00 p.m. in
19 the commissioners' offices, where you told him
20 that you were having an affair with Harry
21 Williamson?

22 THE WITNESS: Asked and answered. I told
23 him no already.

24 MR. CAHILL: Let me object. Objection to
25 the form; asked and answered.

1 Q. So nobody else said anything?

2 A. Yes. I answered. Correct.

3 Q. On Thursday, June 24th, did you -- 2021, did you
4 go to Mr. Williams' office and start to share more
5 information with him regarding Harry Williamson?

6 MR. CAHILL: Do you know?

7 A. I was in Mr. Williams' office with Harry
8 Williamson on Thursday, June 24th.

9 Q. Did you discuss further sexual escapades with him?

10 A. No. That was not what we discussed that day.

11 Q. Did you discuss with him watching a video of a
12 public official's mother having oral sex with
13 Harry Williamson?

14 A. Harry and I were in Tom's office on June 24th. We
15 did not discuss a video on that date with
16 Mr. Williams. We discussed Harry's resigning on
17 that day. And Tom threw the resignation back in
18 his face and told him, I would not wipe my ass
19 with that resignation.

20 Q. Would you go to hotels on county time with Harry
21 Williamson?

22 MR. CAHILL: Objection to the form.

23 If you don't understand his question, let
24 him know that. But I object so that he has
25 an opportunity to fix his question based on

1 what I thought was some ambiguity.

2 A. Yeah, I just feel -- can you be a little more
3 clear?

4 MR. NOVAK: Can you read back the
5 question?

6 (The court reporter read the preceding
7 question as follows: Would you go to hotels
8 on county time with Harry Williamson?)

9 A. No.

10 Q. Did you ever go to any hotels on county time with
11 Harry Williamson?

12 MR. CAHILL: Objection; asked and
13 answered.

14 Q. Ever.

15 MR. CAHILL: Same objection.

16 You can answer.

17 A. No.

18 Q. When did you first tell either of the two county
19 commissioners about your affair with Harry
20 Williamson?

21 MR. CAHILL: Objection; lack of
22 foundation.

23 But you can answer.

24 A. I can't answer, because it's executive session
25 privileged.

1 Q. Are you telling me that disclosing an affair with
2 someone, that you were having an affair with for a
3 period of time from September 2020 through 2021,
4 that you are going to claim that was executive
5 privilege --

6 MR. CAHILL: No.

7 Q. -- or executive session privilege?

8 MR. CAHILL: Objection; calls for
9 attorney-client privilege communication.

10 MR. NOVAK: Between who and who?

11 MR. CAHILL: If it happened in executive
12 session, multiple lawyers were there.

13 Q. Did you ever have conversations with Commissioner
14 Moore or Lundy, apart from an executive session
15 meeting, regarding your affair with Harry
16 Williamson?

17 MR. CAHILL: Objection. To the extent
18 counsel may have been present with you, do
19 not answer. If you had that discussion with
20 either Commissioner Moore or Commissioner
21 Lundy outside the presence of counsel, you
22 can answer.

23 A. I only recall apologizing to Commissioner Lundy
24 after the executive session.

25 Q. What day was that?

1 THE WITNESS: That goes to executive
2 session. But I can say what day I had the
3 conversation with Lundy, if you want me to.

4 MR. CAHILL: Well, I believe you just
5 testified that you told Commissioner Lundy
6 you were sorry. The question is what day did
7 that occur. So to --

8 A. It was on or about July 28th or the 29th. I
9 either told him that night or the next day. But I
10 did -- I did apologize for the blind side that had
11 occurred.

12 Q. For being dishonest with your fellow
13 commissioners, correct?

14 MR. CAHILL: Objection; argumentative.

15 A. I don't know. Just -- I just apologized in
16 general. I didn't -- I didn't equate it or hook
17 it to anything else.

18 Q. You would like us to believe your testimony today,
19 correct?

20 MR. CAHILL: Objection; argumentative.

21 Q. While you're jamming a floss thing in your mouth.

22 MR. CAHILL: Objection; argumentative.

23 A. I apologize for problems with my teeth, sir. If
24 it annoys you, I'm sorry.

25 Q. So my question for you is: You want us to believe